

McMILLAN LAW GROUP

Julian McMillan, Esq. (SBN: 241937)
2751 Roosevelt Rd., Suite 204
San Diego, CA 92106
Phone: 858-499-8951
Fax: 619-241-8291
Julian@mcmillanlawgroup.com

Attorney for Debtor
Rashid Aliyev and Dilbar Mamedova

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF CALIFORNIA

In re

Rashid Aliyev and Dilbar Mamedova
Debtor.

Case No.: 14-07165-LT13

**STATUS REPORT REGARDING THE
VALUATION OF THE MOBILE HOME**

Hearing:

Date: January 13, 2015

Time: 2:00 PM

Dept.: 3

Room: 129

Judge: Hon. Laura S. Taylor

TO THE HONORABLE BANKRUPTCY JUDGE, CHAPTER 13 TRUSTEE, AND
ALL OTHER INTERESTED PARTIES:

Debtors, Rashid Aliyev and Dilbar Mamedova (hereafter, the "Debtors") respectfully
submit this Status Report Regarding the Valuation of the Mobile Home located at 1315 Pepper
Drive, Space 86, El Cajon, California, 92021 (hereafter, "Mobile Home").

Prior to filing their bankruptcy case, the Debtors had an appraisal completed for the
Mobile Home. The appraisal was conducted by Fischer Auctions Company, Inc. (hereafter,
"Fischer Auctions") on July 3, 2014. In completing the appraisal, Fischer Auctions thoroughly
assessed the interior and exterior conditions of the Mobile Home. Fischer Auctions determined

1 that the value of the Mobile Home, as of July 3, 2014, is fifty one thousand five hundred dollars
2 (\$51,500). See Declaration of Jeff Bloom In Support Of The Status Report Regarding The
3 Valuation Of The Mobile Home, Exhibit A, Inspection and Appraisal Report for the 2006
4 Silvercrest Cottage Manufactured Home Located at 1315 Pepper Drive, Space 86, El Cajon,
5 California, 92021.

6 Creditor Karen Kraemmer (hereafter, "Ms. Kraemmer") alleges that as of September 4,
7 2014 the Mobile Home is worth "no less than eighty thousand dollars (\$80,000)." See
8 Declaration of Rosemary Aljundi RE: Valuation of Mobile Home Located at 1315 Pepper Drive
9 Space 86 El Cajon, California (hereafter, "Aljundi Declaration."), Docket Number 33-1, 3:4. As
10 discussed in the Aljundi Declaration, the method used to determine this valuation was a review
11 of comparable sales from the same mobile home park. The Aljundi Declaration does not include
12 any discussion of assessing the value based upon an inspection of the interior and exterior of the
13 Mobile Home. Given that Fischer Auctions completed a more thorough appraisal, the valuation
14 of fifty one thousand five hundred dollars is more accurate than the value alleged by Ms.
15 Kraemmer.

16 The Debtors hereby request an evidentiary hearing to determine the value of the Mobile
17 Home due to the current dispute over value.

18
19 Dated: January 8, 2015

By: /s/ Julian McMillan
Julian McMillan, Esq.
Attorney for Debtors, Rashid Aliyev
And Dilbar Mamedova